Electronically Filed

Docket: 2008-2 CRB CD 2000-2003 (Phase II) (Remand)

Filing Date: 10/21/2022 12:28:13 PM EDT

Before the COPYRIGHT ROYALTY JUDGES Washington, D.C.

In the Matter of))		
)	Docket No.	2008-2 CRB CD 2000-2003
Distribution of the 2000, 2001, 2002)		(Phase II) (Remand)
and 2003 Cable Royalty Funds)		
)		

MPA RESPONSE TO RESTRICTED ORDER FURTHER TO SECOND ORDER DIRECTING RECALCULATION OF ROYALTY ALLOCATIONS

As directed by the Copyright Royalty Judges ("Judges") in their October 13, 2022

Restricted Order Further To Second Order Directing Recalculation Of Royalty Allocations

("October 13 Order") and the October 14, 2022 Restricted Order and Addendum to the October

13 Order ("Addendum"), MPA-represented Program Suppliers ("MPA") hereby notifies the

Judges that it has reviewed the Licensing Section's recalculations as set forth in the Addendum.

MPA notes that the Licensing Section's recalculations in the Addendum are dated as of April 30,

2022, which was approximately six months ago. MPA hereby notifies the Judges that it has no

objection to the Licensing Section's recalculations as set forth in the Addendum, subject to the

Licensing Section updating their calculations to account for the growth of the royalty funds and

interest that has accrued since April 30, 2022.

MPA respectfully requests that the Judges proceed to order a final distribution of royalties to MPA, Independent Producers Group ("IPG") and the Settling Devotional Claimants ("SDC") based on the Licensing Section's recalculations, and requests that the Judges direct the Licensing Section to update their recalculations to reflect growth of the funds and interest that has accrued as of date of the final distribution as a part of that order.

Respectfully submitted,

MPA-REPRESENTED PROGRAM SUPPLIERS

/s/ Gregory O. Olaniran_

Gregory O. Olaniran
D.C. Bar No. 455784
Lucy Holmes Plovnick
D.C. Bar No. 488752
MITCHELL SILBERBERG & KNUPP LLP
1818 N Street N.W., 7th Floor
Washington, D.C. 20036
Telephone: (202) 355-7817

Fax: (202) 355-7887 goo@msk.com lhp@msk.com

Dated: October 21, 2022

CERTIFICATE OF SERVICE

I certify that on October 21, 2022, I caused a copy of the foregoing to be served on all parties registered to receive notice by eCRB by filing through the eCRB filing system.

/s/ Lucy Holmes Plovnick	
Lucy Holmes Plovnick	

Proof of Delivery

I hereby certify that on Friday, October 21, 2022, I provided a true and correct copy of the MPA Response To Restricted Order Further To Second Order Directing Recalculation Of Royalty Allocations to the following:

Joint Sports Claimants, represented by Michael E Kientzle, served via E-Service at michael.kientzle@arnoldporter.com

Independent Producers Group (IPG), represented by Brian D Boydston, served via E-Service at brianb@ix.netcom.com

Settling Devotional Claimants (SDC), represented by Michael A Warley, served via E-Service at michael.warley@pillsburylaw.com

Signed: /s/ Lucy H Plovnick